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March 20, 2024

BY ECF:

The Honorable Judge Colleen McMahon United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

RE:

United States v. Amir Elmaani Case No.: 20-cr-00661-001 Southern District of New York

Letter Motion Seeking Release of Security and Lifting of Lien on Properties

Dear Judge McMahin,

Please be advised that I represent Amir Elmaani in the above referenced action.

Amir Elmaani was released on a surety bond on March 18, 2021. As part of that bond, properties owned by Stephen Bartolomeo and Rita Zare and located at 1792 Needy Road, Martinsburg, West Virginia, and 336 Switch Road, Hope Valley, Rhode Island were pledged as collateral.

Mr. Elmaani was sentenced on <u>October 31, 2023</u>, and surrendered to the BOP on <u>February 13, 2024</u>. He is currently located at Loretto FCI with a release date of February 14, 2027. His registered number is 21374-509.

We respectfully ask that Your Honor release the security and lift the lien that is on the Rhode Island property. The Government does not object to this request.

Thank you for your time and consideration in this matter.

Sincerely,
Spodek Law Group P.C.
/s/ Todd A.Spodek
Todd A. Spodek

cc: All Counsel (By ECF).

Amir Elmaani (By First Class Mail).